



# CODE OF CONDUCT

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## Abstract

We strive to create an environment in which employees willingly come to work every day, a place of tolerance, respect, responsibility and fair behavior, and our activities for the development of the company must meet the highest standards of ethics, honesty and integrity

**Brugg eConnect Poland Sp. z o.o**

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# 1 APPLICATION OF THE CODE IN PRACTICE

We strive to create an environment where employees willingly come to work every day, a place of diversity and tolerance, respect, responsibility and righteous behavior. All our activities for the development of the company must meet the highest standards of ethics, honesty and integrity. Any action taken in doing business on a global basis must not only comply with these highest standards, but also with this Code of Conduct (the "Code"), BRUGG policies and procedures, and all applicable laws, regulations and other laws. All BRUGG employees (including temporary employees and contractors), board members and officers are responsible for reading, understanding and complying with this Code and BRUGG policies and procedures. In addition to these responsibilities, BRUGG management and supervisors are also responsible for:

- being a role model and creating an environment where employees feel at ease, ask questions and raise concerns without fear of retaliation;
- regularly raising awareness among management staff of the Code and applicable BRUGG policies ;
- Being at the disposal of employees seeking advice; and
- timely transfer of issues or problems raised by employees to a higher level or human resources.

The expectations in this Code apply globally, whether the employee is working remotely, in the office, holding a business meeting, attending a customer event, or performing any other activity on behalf of BRUGG. In the event of any conflict between this Code and BRUGG policies and local laws and regulations, the more stringent standards or ethical behaviour shall prevail.

## 1.1 It is about estimate

It is the responsibility of every BRUGG employee, customer and contractor to build a positive workplace. In order to maintain a fully inclusive culture in which each person is perceived as unique, we must treat all employees, customers and other contractors with respect. No direct or indirect discrimination or harassment, or offensive or indelicate behaviour, will be tolerated.

## 1.2 . Seeking advice

This Code lists most of the common situations that employees may encounter, but it does not cover all of them. There can always be circumstances that need to be considered on an individual basis or in which it is uncertain what is appropriate.

Sometimes it is obvious what to do right, but in many situations it is not easy to make the right decision. This is especially true when dealing with time pressures or seemingly opposing business pressures. In such situations, ask yourself the following questions to help you make the right decision:

1. Is the behavior legal?
2. Is the behaviour consistent with the BRUGG Code and policies ?
3. Will I be honest in behaving this way?
4. Will I be protecting BRUGG's reputation by doing so ?
5. Will public disclosure of my behaviour make me feel comfortable?

If the answer to one of the above questions is "no" or you are unsure what it should be, hold off and refer back to your line manager or human resources. It is important to seek advice before taking any action.

## 2 SPEAKUP

At BRUGG, we all have a responsibility to ensure that our business is conducted with integrity and in full compliance with this Code, BRUGG policies, and applicable laws, regulations and other legal provisions.

If an employee becomes aware of a suspected violation or alleged misconduct, they must report the problem immediately.

### 2.1 How do I report a problem?

There are several ways to report a problem:

- speak directly to your manager or a member of BRUGG Human Resources ;
- report the problem online at [www.bruggeconnect.com.pl](http://www.bruggeconnect.com.pl) ;
- call to BRUGG using the phone numbers listed at [www.bruggeconnect.com.pl](http://www.bruggeconnect.com.pl) ; or
- send a message to the supervisor's address .

Some of the above methods allow you to report anonymously where permitted by national law. Nevertheless, encouraged all the people that made the notification to reveal their identity, because in this way BRUGG will m bed depth to respond to the application in a more effective and efficient.

## 2.2 No Retaliation

BRUGG strictly prohibits retaliation against anyone who reports a concern or potential misconduct in good faith. If an employee believes that they have been retaliated against, they should report it immediately to a member of BRUGG Human Resources .

## 2.3 Investigations and Violations

BRUGG seriously all reports of potential violations or improper behaviour and is involved in assessment and investigation of all credible allegations. Employees have a duty to fully and truthfully cooperate with any internal investigation if requested by BRUGG .

In addition, nothing in this Code or company policies or agreements is intended to prohibit or limit an employee's ability to report, cooperate with, or provide information to an appropriate governmental or regulatory authority in connection with a violation, investigation, governmental inspection, or regulatory filing. query.

Violations of this Code and BRUGG's policies and all applicable laws and regulations, and attempts to conceal violations, may result in disciplinary action, up to and including termination of employment. In some circumstances, your actions may also result in a fine or other penalty being imposed on you or BRUGG . Therefore, it is important to always follow the rules and limitations set out in this Code.

# 3 MOST IMPORTANT PRINCIPLES

## 3.1 Multiplying good

We understand the support our employees and customers need, and we go the extra mile to help them by focusing on what we all have in common.

### 3.1.1 Build and maintain a diverse workplace

At BRUGG, we cultivate an environment where a unique diversity of employees, suppliers, customers and other contractors is not only welcomed but also accepted. We praise and promote individual expression, innovation and achievement, appreciating the strength and expertise that different points of view bring. We are committed to accepting other cultures, languages and views, while strengthening our diverse workforce and business partners and increasing their competences.

BRUGG will only achieve its full potential if everyone in the company feels ready to reveal their uniqueness. All employees need to know that they can be “one hundred percent themselves” at work without fear of harassment or discrimination. Such a workplace can

only be achieved and maintained if we work together and treat each other with respect and dignity, without bias or prejudice.

We are committed to providing all employees with equal opportunities. We are committed to ensuring that the demographic profile of the workforce at all levels of the organization matches the markets we serve.

### **3.1.2 Being a tolerant worker**

We are tolerant, we treat each other with respect and we work fairly, honestly and ethically. To BRUGG in bed depth fulfil their commitment to build and maintain a diverse workplace, workers must engage in promoting a tolerant, unbiased culture that allows you to express your unique potential of each person. Each employee must demonstrate commitment by mastering the following competencies:

- purposeful impartiality: gaining conscious knowledge about one's own subjective beliefs, working to eliminate them and actively promoting an equal and decent workplace;
- active tolerance: storytelling is for a culture in which the uniqueness of each employee is appreciated and developed, and constant action to support it;
- Working efficiently with multiple cultures: actively striving to understand how other people perceive the world and adapting their behaviour in order to collaborate effectively in a culturally diverse workplace; and
- commitment to diversity: showing an active commitment to support BRUGG's business goals of tolerant diversity by ensuring that all levels of our organization reflect the markets we serve.

## **3.2 Human rights and fair work**

BRUGG respects everyone's fundamental human rights and is committed to paying employees fair and equitable remuneration. As part of this commitment, BRUGG recognizes the right of workers to freedom of association and collective bargaining.

The BRUGG prohibits the use of child labor, forced labor and human trafficking; this prohibition also extends to BRUGG's contractors .

# **4 ETHICS, HONESTY AND TRANSPARENCY**

## **4.1 Conflicts of Interest**

Avoiding conflicts of interest is essential in conducting business in an ethical, honest and transparent manner. Persons working for BRUGG must ensure that their personal interests

and relationships do not create a conflict or even a suspected conflict with their professional obligations towards BRUGG .

A conflict of interest can take many forms and arises when an employee's personal activities and relationships actually or appear to conflict with his ability to act in the best interests of BRUGG .

You should immediately disclose potential conflicts to your manager to resolve them. The good news is that most conflicts can be resolved just by reporting them.

## **5 ALWAYS BE RESPONSIBLE**

At BRUGG, we care about the safety of our employees and maintain the communities in which we operate.

### **5.1 Sustainable development**

Sustainability is at the heart of BRUGG's business . This principle and our commitment to the future have been formalized in the form of a sustainable development strategy and are a driver of innovation that results in social and environmental improvements, from responsible sourcing of raw materials, through eco-efficient production processes , to carefully designed products incorporating the key features of sustainable development. . Our strategy, which is based on four pillars - environmental footprint, sustainable innovation, responsible sourcing, and people and communities - is fully integrated and uses the most relevant opportunities to create products for customers and consumers around the world.

### **5.2 Maintaining a safe working environment**

When it comes to protecting the safety of employees, contractors and visitors for our persons , we cannot cut corners. We must all be committed to maintaining a safe working environment, whether it is cleaning up water spilled on the hall floor or reminding colleagues to wear safety glasses or masks. Each of us is responsible for understanding and complying with all applicable BRUGG laws, regulations and policies designed to ensure safe working conditions and to prevent injuries and accidents.

By being vigilant, observing our surroundings and acting when appropriate, we can all play a part in ensuring that our workplace is safe. Immediately after noticing dangerous conditions or activities, contact your supervisor, plant manager or a health and safety specialist .



**Remember - in the field of health and safety and the environment, even small things are important.**

### **5.3 Alcohol consumption and drug use**

BRUGG maintains a safe working environment that cares about the health and safety of employees and protects the consistency of the company's business practices. BRUGG does not tolerate the use, sale, possession or distribution of drugs on company premises, during work or while using company-owned equipment or vehicles. The rules are clear: working under the influence of drugs or alcohol is a threat to all employees and is strictly prohibited.

### **5.4 Violence in the workplace**

All acts of violence or behaviour that threaten others by employees or other persons at BRUGG's facilities or in the course of carrying out activities or activities on behalf of BRUGG are unacceptable and strictly prohibited. Such behaviours include physical aggression and verbal threats, as well as possession of any type of weapon. Such acts and behaviour must be reported immediately. In the event of imminent danger, immediately contact the local police or fire department and follow the applicable factory policy or crisis management policy.

## **6 PREVENTION OF BRIBERY AND CORRUPTION**

### **6.1 Anti-Corruption Laws**

The anti-corruption laws apply to all BRUGG employees and activities .

While anti-corruption laws differ from country to country, BRUGG has clear rules:

- never give or offer a bribe or facilitation payment to any person, including a government official or contractor;
- never ask for or accept a bribe; and
- never use a third party or agent to pay or accept a bribe, whether on behalf of yourself or for a company.

If an employee believes that another colleague or third party is having a negative influence, pays bribes or other corrupt behaviour, or if he or she feels that something is wrong, he should immediately contact his immediate supervisor .

## **6.2 Interactions with Government Officials**

As a company markets a global ego often we are forced to contact government officials in countries which carry out business transactions , however, when such contacts must have an additional caution, because in relation to those of the workers, even the best intentions can result in a violation of anti-corruption laws.

## **7 POLITICAL ACTIVITIES**

We encourage all our employees to engage in the local community and demonstrate civic activity. However, we do not allow the use of working time or other company resources or assets such as facilities, telephones, computers, photocopiers or office supplies for these purposes. We also do not allow employees to post or distribute any material at BRUGG facilities or to recruit other employees during working hours.

It is entirely up to the employee to decide whether to take time off or donate money or other personal resources to political or social activities, and if the employee engages in such activities, the company will not take action against the employee because of his political views or political donation. When participating in political procedures, an employee must comply with the laws and regulations governing political activities and political donations.

## **8 GIFTS AND GUEST**

At BRUGG, we support successful professional relationships and goodwill with our customers, suppliers and other business partners as they are essential to our success. We understand that business entertainment, such as dining at restaurants or attending events, can play an important role in strengthening these relationships. We also appreciate the existence of cultural practices in the countries that include the giving of gifts.

While we respect these practices, we must be careful that they do not become more important than our commitment to comply with the laws and BRUGG policies . As a general rule, gifts, hospitality and entertainment must never be given or received with the intention of obtaining or maintaining a business transaction or influencing a government official. We should also avoid circumstances that give rise to even the appearance of improper intent.

Offering or accepting gifts of small value may be permitted provided that it is done expressly and lawfully in accordance with acceptable industry practice and the location where it takes place. Gifts can take many forms, such as free products or services, special favors, discounts, entertainment, or even free transportation to an appointment or back. However, lavish gifts, cash or cash equivalents such as gift cards are never permitted.

While it's not always easy to understand the difference between appropriate and inappropriate entertainment and gifts, the following rule of thumb should be adhered to: if something doesn't look right, it probably isn't.

On the other hand, if it would be inconvenient for BRUGG or the employee to disclose the gift or entertainment to the public, they are not acceptable. If you are unsure about a particular gift or entertainment, or if the gift or entertainment is to be given to a government official, always contact your supervisor before taking action.

## **9 RIGHT DOING YOUR BUSINESS**

### **9.1 Our counterparties**

We treat the business environment as a whole and empower our teams to make ethical decisions fairly.

Doing business with integrity and ethics means we must consider the implications for our reputation and finances in all our dealings with our business partners. As part of this commitment, BRUGG will only work with reputable contractors who comply with all laws and regulations and adhere to the same ethical principles as BRUGG. When working with contractors, you should:

- avoid any practice that is unfair or fraudulent;
- treat all contractors honestly, fairly and objectively;
- fairly and honestly about BRUGG's products and services ;
- where necessary, follow proper sourcing and purchasing procedures; and
- select contractors on the basis of their value, not because of a conflict of interest.

In addition to complying with the above principles, it is important to ensure that our business partners are adequately backed up to protect BRUGG from the risk of corruption and other risks arising from engaging in transactions with reputable business partners.

### **9.2 Money Laundering and Related Activities**

BRUGG prohibits any kind of money laundering, terrorist financing or financing other unlawful or unreasonable purposes.

If the employee suspects that the contractor is involved in illegal or suspicious activities, he should immediately contact his immediate supervisor.

### **9.3 The rules the control of trade**

BRUGG offers its expertise, creativity and its products in various countries. Operating on a global scale means that BRUGG is subject to the trade control laws of the various countries in which it operates and is committed to complying in full.

If a BRUGG employee is responsible for deciding who BRUGG buys or sells products from, or plays a different role in international business transactions, he or she must read the BRUGG Purchasing and Sales Policy .

Export control and anti- boycott laws are extremely complex. If you have questions or concerns about participating in a prohibited transaction, or if you receive a boycott request, contact your line manager .

### **9.4 Proceedings against competitors**

BRUGG is committed to achieving success through fair and lawful competition, strictly prohibiting all activities that violate antitrust laws or unlawfully restrict competition.

You may not discuss or agree with competitors or others:

- fixing or controlling prices or other terms of sale, including discounts, rebates, freight or other matters;
- adjusting the content of tender offers;
- boycotting suppliers or limiting production; or
- the separation of markets, territories, product lines or customers.

Even informal discussions with competitors about this type of activity are prohibited and illegal. If you have questions about contacting or interacting with competitors, ask your supervisor for advice .

#### **9.4.1 Competitor Information**

BRUGG does not and will not tolerate any unlawful or unethical actions to obtain or disclose information in the possession of competitors, no matter how useful it may be.

Instead, competitive information should be obtained in a lawful and ethical manner, for example, by reviewing documents filed with regulatory authorities, public statements by executives, media articles and other publicly available information.

In short: agreeing or agreeing to agree on prices is against the law.

## 9.5 With dignity with all the provisions and Regulatory Affairs

BRUGG operates in full compliance with all laws, regulations and laws in force in each country in which it is an active y . These provisions regulate:

- labelling of BRUGG products or consumer goods containing these products;
- statements about BRUGG products ; and
- methods of manufacturing and shipping products.

BRUGG's global reputation and success depend on all employees understanding and applying the principles that govern our business. If you have any questions about these rules, please contact your supervisor immediately.

## 10 PROTECTION OF BRUGG'S ASSETS

### 10.1 Avoiding fraud, theft, waste or misuse

When it comes to protecting BRUGG's assets, assets and know-how , we act as if we own them, as they enable us to provide the best products and services to our customers.

We assume that BRUGG property and assets will be used solely for business purposes. It is strictly forbidden to misappropriate or misuse BRUGG's property and assets , as well as to use them for one's own, unethical or unlawful purposes, or for personal gain. We are all responsible for preventing the theft, waste and misuse of BRUGG property and assets.

Under this responsibility, you must:

- adhere to the BRUGG Global Purchasing Policy when sourcing raw materials and services;
- avoid wasting company funds on business travel or entertainment;
- ensure that all transactions are made with appropriate authorization and within the limits of the authorization; and
- return to BRUGG all of its property and assets, whether tangible or intangible, upon termination of the employment relationship with BRUGG .

### 10.2 Intellectual Property and Trade Secrets

Intellectual property invented, created or developed by BRUGG or an employee in the course of employment with BRUGG is the property of the company and is often confidential. Like all other assets BRUGG , including intellectual property BRUGG you may be used only in connection with the activities of the company for the benefit of her.

BRUGG's intellectual property may not be used or made available without the creation of appropriate legal safeguards and documentation.

If you have questions about intellectual property, please contact your manager .

### **10.2.1 Safeguarding Our Assets**

Protecting the confidentiality and integrity of our discoveries, unique formulas, manufacturing processes and scientific data allows BRUGG to remain at the forefront of the industry. To BRUGG m bed depth to maintain a competitive advantage and the ability to consistently provide customers with competitive products and services, it is essential that together we try to protect these unique and sensitive assets, as well as other confidential and proprietary information, such as the sales, transactions and prices.

Employees must protect confidential and proprietary information belonging to BRUGG and its employees, customers, suppliers and other business partners, and take steps to prevent unauthorized access to this information.

Just as we cannot diminish our competitive advantage by disclosing confidential and proprietary information belonging to BRUGG and its business partners, we must not compromise our high standards of ethics, integrity and integrity by accepting or using confidential and proprietary information belonging to third parties, including ours. customers and competitors.

If you are unsure whether or not information is confidential, ask yourself the following questions:

- Is this information not publicly known?
- Could its disclosure harm or weaken BRUGG , its employee or contractor?
- Could the disclosure of information jeopardize the performance of work by the employee or other persons?
- Would the disclosure or use of the information be a violation of the law?

Jf you to any of these questions answered in the affirmative, to be considered as confidential information and treat it accordingly. In addition, some confidential and proprietary information may be trade secret. Generally speaking, information relating to BRUGG's practices and processes may be considered a trade secret if:

- they are known only to a small group of people;
- have a high commercial value due to their secrecy; and
- BRUGG takes reasonable steps to protect them from disclosure.

In order to help BRUGG maintain a competitive advantage, the employee must take steps to effectively protect trade secrets and confidential information in compliance with the BRUGG Confidential Information and Trade Secrets Policy . This obligation lasts for the entire duration of employment with BRUGG , including outside the workplace and during working hours, as well as after the termination of the employment relationship.

### **10.3 With outrage confidentiality during communication**

When communicating confidential and proprietary information, be it in writing via email, instant messaging, through personal and professional social media accounts, or in face-to-face or virtual chats, always be careful and thoughtful. When talking on the phone or in a public place (e.g. elevator, restaurant or public transport), or at a social event, pay attention to your surroundings. Remember that your responsibility to protect confidential and proprietary information also applies to conversations with friends, employees of other companies, and even family members. This obligation continues after termination of employment with BRUGG .

Disclosure of inside information should be strictly limited to BRUGG employees (or advisers) who are authorized and need to know this information to perform their duties towards the company. Likewise, disclosure of confidential information outside of BRUGG should only take place when required for business purposes and after steps have been taken, such as entering into a confidentiality agreement, to prevent further dissemination or misuse of that information.

If you have questions about confidentiality or information restriction and disclosure, please contact your supervisor .

### **10.4 Complete of documentation**

Complete and accurate books and records are legally required and necessary to manage BRUGG's business and maintain the accuracy and consistency of our financial statements and disclosures, which ultimately affects BRUGG 's credibility and reputation .

The term "books and documentation" means not only financial statements, but all documents prepared, generated or maintained in the course of BRUGG's operations , including invoices, purchase orders, contracts, time sheets, payslips, travel and expense reports, test results, device readings, technology gap reports, safety and environmental reports, and documents filed with regulators.

Due to the extensive nature of the documentation, the responsibility for ensuring its accuracy and completeness rests with each employee, not only BRUGG's accounting and financial staff . The employee who contributes to the production of business records, such as submitting an expense report, timesheet, or purchase order, is responsible for the integrity and accuracy of the information provided.

Any attempt to conceal or distort information in BRUGG's books or records is a serious violation of the law.

A simple rule applies: all documents and reports must be complete, fair, accurate, timely and not misleading. There are no exceptions to this rule.

### **10.4.1 Retention of Documents**

All business documents must be retained and disposed of in accordance with the BRUGG Record Retention Policy .

The BRUGG business record retention periods do not apply where an employee has been instructed to retain certain documents or records for pending , potential or reasonably foreseeable litigation, investigation, audit or administrative proceedings. Compliance with this obligation is extremely important as the destruction or alteration, even inadvertently, of a legally significant or retainable document may expose BRUGG and the employee to criminal and civil penalties.

If in doubt about the retention period of a document, keep it and review the Record Retention Policy or contact your supervisor for further guidance.

## **11 COMMUNICATION AND PRIVACY**

### **11.1 Communication outer**

As an international company , it is imperative that we speak with one voice so that all external communications are truthful, accurate and consistent.

Employees may not make public statements or answer questions about BRUGG , its activities or operations or any other BRUGG employee, unless expressly authorized to do so. This limitation applies to:

- traditional media in all communication channels;
- public speaking;
- personal and professional social media accounts;
- books, articles and other published data;
- blogs and other online content platforms; and
- requests for official or non-official information, including from analysts.

If an employee receives a request for information, he should pass it on to his supervisor .

### **11.2 Systems Information and Communication**

BRUGG systems , including electronic information and communication systems, e.g. computers, mobile devices, servers, telephones, e-mail and general internet access , as well as all information and messages sent, received or stored using these systems, are made available to employees for business purposes. We expect each employee to use these resources appropriately. Examples of improper use are:



- communication that is offensive, threatening, defamatory, vulgar, racist, pornographic or inappropriate;
- unauthorized copying or transmission of sensitive or confidential personal data, including trade secrets;
- access or view networks, servers, drives, folders or files to which the user does not have permission;
- recruitment of employees for personal purposes, including collections for political purposes or religious practices, without authorization;
- activities related to the employee's own business; and
- any illegal, unethical or other activity that violates this Code or any BRUGG policy .

We expect employees to protect BRUGG systems from accidental or unauthorized access, to keep passwords to all BRUGG systems confidential, and to comply with BRUGG's policies on BRUGG systems and information security .

The information in these systems is the property of BRUGG and in order to maintain its security, the employee must use only BRUGG systems to transmit, receive or store this information. This means that systems other than those BRUGG , including e-mail account belonging to an employee or a third party, external account to share files, electronic devices, and flash drives cannot be used to operate the BRUGG , unless BRUGG has consented to it in writing.

In order to protect its assets and reputation and users, BRUGG reserves the right, in accordance with applicable law, to monitor, access, view, delete and record information and correspondence, including personal e-mails received, displayed or stored in BRUGG systems , as well as the way the employee uses BRUGG systems and activities performed in them or through them (including browsing websites). Consequently, the employee should not expect such information, correspondence or activities to be his private matter.

If an employee believes that BRUGG data has been unintentionally or intentionally mishandled or disclosed, please contact BRUGG IT Department .

### **11.3 Privacy and Personal Information**

Personal data is data that can be used to identify a natural person, including employees, contractors, contractors, customers and any other person with whom BRUGG deals. BRUGG needs to collect personal data, inter alia, to administer employee benefits, manage customer and contractor relations and comply with legal requirements. BRUGG respects the confidentiality of personal data, both on paper and in electronic form, and requires that such data be handled responsibly and in accordance with applicable privacy laws.

If an employee has access to personal data in the course of their work, it is important that they collect, display, use or disclose such data only to the extent necessary and appropriate for the performance of their professional duties and in accordance with BRUGG's internal policy and national laws and regulations. You must not disclose personal information, whether during or after employment, to persons inside or outside BRUGG who do not show a legitimate need to know it. If you have knowledge or suspicion of misuse, loss, theft or inadequate access to data, you should immediately report it to your supervisor .

If you have questions about privacy laws or your responsibilities, please contact your supervisor .

## **12 GENERAL MESSAGE**

The values, expectations and practical guidelines contained in this Code form the basis of the behaviour expected of BRUGG employees . However, the provisions of the Code are only a skeleton, and it is the responsibility of each employee to fill it with content.

We know that is not encountered in any situation, you can easily guess how to proceed, also contact the individual with superiors , that tears can assist and provide guidance.

BRUGG's success depends on employees behaving ethically, seeking help and acting when irregularities occur. Together, we will create a positive workplace that promotes everything that is special about BRUGG and its employees.